

Public Response Request:

Acupuncture/Dry Needling

OCT 08 2015

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Please check "Yes" or "No" for who you think should be allowed to use acupuncture needles:

Yes No

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- Doctors of Chiropractic, 100 hours of non-accredited, certified training.
- Physical Therapists, minimum 24 hours of training in Dry Needling.
- Athletic Trainers, minimum 24 hours of training in Dry Needling.
- Medical Doctors, with 0 to 300 hours of training.

Please use the space below to further explain your opinion (more space on the back):

Your Name (required): Jan Daly

I have been a patient of Beth Terrell's
for 13 1/2 years. Only licensed therapists should
be allowed to perform. more on back...

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Please use the space below to further explain your opinion (more space on the back):

Your Name (required): Chen Tefft

more on back...

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Your Name (required): DOROTHY A. FLORES

Having had experience during the past 63 years with
chiropractors, and other health-care professionals,
I feel very strongly that chiropractors should practice

more on back...

Your Name: DOROTHY A. FIORES

their professions, as should others practice the professions in which they have been trained and certified and who keep their licenses current. I have seen too many "professionals" in the health care arena who become easily distracted - because of office necessities, patient interactions, or other distracting influences. I choose my health care professionals with great care and I want them to be focused. Please consider how minimal 24 hours, 100 hours or 300 hours of training actually is. When inserting needles into a patient's body, it is imperative that the health-care professional is THOROUGHLY trained in so much more than just the placement of "a needle." As is known, a slight misjudgment of placement can do severe damage to a patient.

I would urge the Iowa Board to seriously consider the consequences of not requiring thoroughly trained practitioners.

I urge the Board to require the highest standards for anyone who is allowed to insert needles into the human body.

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Your Name (required): Kathy Butler-Klein

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Your Name (required): Jolene K. Herman (Jolene K. Herman)

more on back...

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Your Name (required): Rhona Hauser

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Please use the space below to further explain your opinion (more space on the back):

Your Name (required): Sydney Ofstein

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Your Name (required): DENNIS M. LINDEMAN

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Your Name (required): Robin Kinehan

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Your Name (required): Karen Van Hamme

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Please use the space below to further explain your opinion (more space on the back):

Your Name (required): James C. Loos

I do not think anyone but fully licensed
acupuncturists should be allowed to
do needling at any level.

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Please use the space below to further explain your opinion (more space on the back):

Your Name (required): LINDA CARPENTER

Education is vital, don't allow chiropractors,
physical therapists, athletic trainers dry needle.

more on back...

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Please use the space below to further explain your opinion (more space on the back):

Your Name (required): THERE IS MORE TO ACUPUNCTURE THAN STICKING A
NEEDLE A NEEDLE IN A TRIGGER POINT. I WANT SOMEONE WHO
KNOWS WHAT THEY ARE DOING. I DON'T WANT THERE TO BE A
GENERAL CONFUSION IN THE "PUBLIC". SUFFICIENT INITIAL TRAINING
NEEDS TO COME FIRST AND THEN CONTINUING NEEDS TO more on back...
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Your Name (required):

Phyllis Seemins

I am a long time patient of an
acupuncturist.

more on back...

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Your Name (required): Dry needling seems so ignorant
of unsafe when performed by someone w/
such little practice. Trigger point injections
done by doctors is a better practice. →

more on back...

Your Name: Claire Couture

This is a public health concern b/c the consumer is far less educated about certifications. If they "think" that receiving acupuncture treatments from a Chiro or P.T. is the same as from an acupuncturist, they're gravely mistaken. Acupuncture should also be used w/ Eastern Holistic medicine. Not just as a "tool" by a practice layman. Please protect Iowans + consider these opinions + facts.

Claire Couture

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Your Name (required): Judy Aikin 1706 Burr Oaks Drive
515 988-4445 West Des Moines, IA
50266

Get on board Iowa POT! I find it

hard to understand this state allowing

more on back...

Your Name: Judy Aikin

allowing a medical profession to be
"watered down" to this degree. The very sad
part of this story is there are so many
people being "duped" out of the many
positive treatments that real acupuncture
provides. No profession should be
allowed to call themselves something they
are not - Very simply put! Please
regulate this problem so citizens
receive the treatments they are expecting
and realize the outcomes that they
read about and hear from others that
have experienced true acupuncture from
a true Acupuncturist. Please feel free to call
me for an interview on my treatments.

515 988-4445

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Dry Needling

On 11 September 2015, a handful of Iowa licensed acupuncturists attended the Iowa Board of Physical and Occupational Therapy's Meeting. On the agenda was time to discuss whether physical therapists should be able to perform an acupuncture technique called Dry Needling. All of the acupuncturists in attendance spoke against PTs performing this invasive therapy, but physical therapists in attendance argued for the "Dry Needling" acupuncture technique to be allowed. Following this meeting, the Iowa POT Board will allow public input on this matter **only until October 29**. Then they will deliberate and make a final decision in December. The Board published the following statement:

"Anyone from the public wishing to submit written comments or other documents may do so by mailing or delivering them to the [Iowa Physical and Occupational Therapy] Board office "Attn: Judy Manning" or by emailing them to Judith.manning@idph.iowa.gov.

All submissions must be received by October 29, 2015." The Board is located in the Lucas Building, at 321 E 12th St, Des Moines, IA, 50319.

Feel free to use this sheet to record your opinion on this public safety matter, so that your opinion may be submitted to the Board. You may also send letters or emails directly to the Board.

Please check any and all boxes for who you think should be able to use acupuncture needles:

Yes No

- Licensed Acupuncturists, 2500+ hours of education(including 700-900 hours of supervised clinical internship) resulting in Nationally Accredited Graduate Degrees.
- Doctors of Chiropractic, 100 hours of non-accredited, certified training.
- Physical Therapists, minimum 24 hours of training in Dry Needling.
- Athletic Trainers, minimum 24 hours of training in Dry Needling.
- Medical Doctors, with 0 to 300 hours of training.

Please use the space below to further explain you opinion (more space on the back):

Your Name (required): *Eraine Smith Bright*

more on back...

Public Response Request:

Dry Needling

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Yes No

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- Doctors of Chiropractic, 100 hours of non-accredited, certified training.
- Physical Therapists, minimum 24 hours of training in Dry Needling.
- Athletic Trainers, minimum 24 hours of training in Dry Needling.
- Medical Doctors, with 0 to 300 hours of training.

Please use the space below to further explain you opinion (more space on the back):

Your Name (required): Amanda R Warner

more on back...

Public Response Request:

Dry Needling

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Yes No

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- Doctors of Chiropractic, 100 hours of non-accredited, certified training.
- Physical Therapists, minimum 24 hours of training in Dry Needling.
- Athletic Trainers, minimum 24 hours of training in Dry Needling.
- Medical Doctors, with 0 to 300 hours of training.

Please use the space below to further explain you opinion (more space on the back):

Your Name (required): Melissa M Cano

more on back...

Public Response Request:

Dry Needling

OCT 08 2015

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Yes No

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- Medical Doctors, with 0 to 300 hours of training.

Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name:

Chellie J. Howard Hallie L. Harvard

Under no circumstances should any practitioner,
other than a licensed acupuncturist, attempt
treatments with acupuncture needles. Practitioners



That see the value in acupuncture should use the referral system to continue their patient's case, as they would with any other specialist. They absolutely should NOT attempt to administer acupuncture treatments themselves.

Public Response Request:

Dry Needling

OCT 08 2015

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: ANDY BENKO

Public Response Request:

Dry Needling

OCT 08 2015

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- Athletic Trainers, minimum 24 hours of training in Dry Needling.
- Medical Doctors, with 0 to 300 hours of training.

Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Mary Janssen

Public Response Request:

Dry Needling

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Yes No

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- Doctors of Chiropractic, 100 hours of non-accredited, certified training.
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- Athletic Trainers, minimum 24 hours of training in Dry Needling.
- Medical Doctors, with 0 to 300 hours of training.

Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Barb Drossler

Public Response Request:

OCT 08 2015

Dry Needling

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Please check any and all boxes for who you think should be able to use acupuncture needles:

Yes No

- Licensed Acupuncturists, 2500+ hours of training, Nationally Accredited Graduate Degrees.
- Doctors of Chiropractic, 100 hours of non-accredited, certified training.
- Physical Therapists, minimum 24 hours of training in Dry Needling.
- Athletic Trainers, minimum 24 hours of training in Dry Needling.
- Medical Doctors, with 0 to 300 hours of training.

Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Jerry Zeak

I Am a patient of a Licensed Acupuncturist.
My treatment varies based on my issues.
I need a knowledgeable Acupuncturist to ensure

The right procedures are taken with
dry needles. The other options lack
the knowledge and skill to be effective
and safe. Just like other specialists,
you need the knowledge and skill to
be effective.

Public Response Request:

Dry Needling

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Please check any and all boxes for who you think should be able to use acupuncture needles:

Yes No

- Licensed Acupuncturists, 2500+ hours of training, Nationally Accredited Graduate Degrees.
- Doctors of Chiropractic, 100 hours of non-accredited, certified training.
- Physical Therapists, minimum 24 hours of training in Dry Needling.
- Athletic Trainers, minimum 24 hours of training in Dry Needling.
- Medical Doctors, with 0 to 300 hours of training.

Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Angela Zerk

I am an acupuncture patient. My
treatment is done by a licensed acupuncturist.
There are an unlimited number of situations

→

that can benefit from acupuncture.
In order to be trained and fully
knowledge of all aspects of the
treatment the minimum 2500 hours
of training is necessary.

Public Response Request:
Acupuncture/Dry Needling

OCT 08 2015

On 11 September 2015, a handful of Iowa licensed acupuncturists attended the Iowa Board of Physical and Occupational Therapy's Meeting. The agenda allowed for time to discuss whether physical therapists should be allowed to perform an acupuncture technique they call Dry Needling. All of the acupuncturists in attendance spoke against PTs performing this invasive therapy, but physical therapists in attendance argued for the "Dry Needling" acupuncture technique to be allowed. Following this meeting, the Iowa POT Board will allow public input on this matter **only until October 29**. Then they will deliberate and make a final decision in December. The Board published the following statement:

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Feel free to use this sheet to record your opinion on this public safety matter, so that your views may be submitted to the Board. You may also send letters or emails directly to the Board.

Please check "Yes" or "No" for who you think should be allowed to use acupuncture needles:

Yes No

- Licensed Acupuncturists, 2500+ hours (including 700-900 hours of supervised clinical internship) of training, Nationally Accredited Graduate Degrees.
- Doctors of Chiropractic, 100 hours of non-accredited, certified training.
- Physical Therapists, minimum 24 hours of training in Dry Needling.
- Athletic Trainers, minimum 24 hours of training in Dry Needling.
- Medical Doctors, with 0 to 300 hours of training.

Please use the space below to further explain your opinion (more space on the back):

Your Name (required): MARY C CHICOINE

The skill & knowledge to practice
acupuncture as a part of Chinese
Medicine requires more training &

more on back...

Your Name: Mary C Chicoine

education than a continuing ed
course or a 100 hours of training.

I have benefited from the care
of a licensed acupuncturist for
20 yrs - in conjunction with
Western Medicine.

Thank you.

Public Response Request:

Dry Needling

OCT 08 2015

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Please check any and all boxes for who you think should be able to use acupuncture needles:

Yes No

- Licensed Acupuncturists, 2500+ hours of training, Nationally Accredited Graduate Degrees.
- Doctors of Chiropractic, 100 hours of non-accredited, certified training.
- Physical Therapists, minimum 24 hours of training in Dry Needling.
- Athletic Trainers, minimum 24 hours of training in Dry Needling.
- Medical Doctors, with 0 to 300 hours of training.

Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Diane Bergren

Public Response Request:

Dry Needling

OCT 08 2015

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Please check any and all boxes for who you think should be able to use acupuncture needles:

Yes No

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- Doctors of Chiropractic, 100 hours of non-accredited, certified training.
- Physical Therapists, minimum 24 hours of training in Dry Needling.
- Athletic Trainers, minimum 24 hours of training in Dry Needling.
- Medical Doctors, with 0 to 300 hours of training.

Please use the space below to further explain you opinion (more space on the back):

Your Name (required): Gary Schrim Waukee

more on back...

Public Response Request:

Dry Needling

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Please check any and all boxes for who you think should be able to use acupuncture needles:

Yes No

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- Physical Therapists, minimum 24 hours of training in Dry Needling.
- Athletic Trainers, minimum 24 hours of training in Dry Needling.
- Medical Doctors, with 0 to 300 hours of training.

Please use the space below to further explain you opinion (more space on the back):

Your Name (required): Jan Schirm - Waukee

more on back...

Public Response Request:

OCT 08 2015

Acupuncture/Dry Needling

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Mail to: IPOT/Judy Manning, Lucas Building, 321 E. 12th St., Des Moines, IA 50319.

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Please check any and all boxes for who you think should be allowed to use acupuncture needles:

Yes No

- Licensed Acupuncturists, 3,300+ hours of training (including 700-900 hours of supervised clinical internship), Nationally Accredited Graduate Degrees.
- Doctors of Chiropractic, 100 hours of non-accredited, certified training.
- Physical Therapists, minimum 24 hours of training in Dry Needling.
- Athletic Trainers, minimum 24 hours of training in Dry Needling.
- Medical Doctors, with 0 to 300 hours of training.

Please use the back of this page to further explain your opinion.

Print Your Name (required): Barb Abbott Signature: Barb Abbott

City/State/Zip code: Ames, Iowa 50010

Public Response Request:

Dry Needling

OCT 09 2015

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Yes No

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- Athletic Trainers, minimum 24 hours of training in Dry Needling.
- Medical Doctors, with 0 to 300 hours of training.

Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Ellen M. Remussen

I believe that extensive training and education
are needed to ~~professionally~~ accurately place needles to
achieve a therapeutic benefit.

Public Response Request:

OCT 09 2015

Dry Needling

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Lisa Gravel

Public Response Request:

Dry Needling

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Yes No

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Sean Krewer

Public Response Request:

Dry Needling

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Please check any and all boxes for who you think should be able to use acupuncture needles:

Yes No

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- Doctors of Chiropractic, 100 hours of non-accredited, certified training.
- Physical Therapists, minimum 24 hours of training in Dry Needling.
- Athletic Trainers, minimum 24 hours of training in Dry Needling.
- Medical Doctors, with 0 to 300 hours of training.

Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Nancy Blossum

October 3, 2015

Irene Bassler
13774 Surrey Lane
Dubuque, IA 52002

Iowa Board of Physical and Occupational Therapy
321 E. 12th Street
Des Moines, Iowa 50319

ATTN: Judy Manning

Dear Members,

I am a registered nurse who has been practicing for over 40 years. I have worked in many departments and have taken many hours of training in different areas of health care. But just because I have taken a few courses in different disciplines does NOT mean I am proficient in those areas of health care and it certainly does not mean I should be practice on patients without proper supervision and learning.

As a patient, I have seen doctors, nurse practitioners, chiropractors, physical therapists as well as a licensed acupuncturist (NOT a chiropractor who does acupuncture). I believe each of these health disciplines have their own expertise and I trust that they have had the proper training in their respective fields.

However, recently I have learned from my own chiropractor and my acupuncturist that physical therapists and chiropractors are starting to practice "dry needling" -- this seems like it might be a term they have coined so they can practice acupuncture without proper and significant training. It is my understanding that the "dry needling" they have started practicing is the same as the practice of using acupuncture aschi points. It is also my understanding that the majority of physical therapists and chiropractors do not have extended training in acupuncture (weekend training a couple of times a month is NOT sufficient training).

Please, stop this dangerous practice of allowing sufficiently untrained physical therapists from practicing acupuncture -- dry needling IS acupuncture, no matter what they want to call it.

For the sake of public safety, please tell physical therapists to stick to practicing the skills in which they went to school for. .. and I repeat, a few weekend classes is NOT proper training -- if they want to practice acupuncture, then please tell them to go back to school for at least 2000 hours.

Thank you for your time.

Sincerely,



Irene Bassler

Date

OCT 09 2015

ATTN: JUDY MANNING
IOWA BOARD OF PHYSICAL AND OCCUPATIONAL THERAPY
321 E. 12th STREET
DES MOINES IOWA 50319

RE: The practice of "dry needling" by physical therapists and other disciplines not sufficiently trained to practice acupuncture. It is my belief that "Dry needling" is actually acupuncture using acupuncture needles and acupuncture points (aschi points).

Dear Ms. Manning and Board Members,

I go to a licensed acupuncturist who has years of training. I am concerned that physical therapists are now practicing acupuncture but calling it "dry-needling". They have limited training but are performing a medical treatment that is highly specialized and giving patients a false sense of security. This is an insult to those who have had the proper training to become a licensed ~~acupuncturist~~ acupuncturist.

Sincerely,
Tom E. Baul

OCT 09 2015

Emily Hurm
3408 Woodland Ave Suite #305
West Des Moines, Iowa 50266

Iowa Board of POT
321 E 12th Street
Des Moines, Iowa 50319

To the Iowa POT Board:

In regards to the Physical Therapy Board wanting to allow Dry Needling into their scope of practice, I must say I disagree. In the definition of the modalities physical therapists may use, nowhere does it mention invasive procedures such as puncturing the skin.

Physical therapy is that branch of science that deals with the evaluation and treatment of human capabilities and impairments. Physical therapy uses the effective properties of physical agents including, but not limited to, mechanical devices, heat, cold, air, light, water, electricity, and sound, and therapeutic exercises, and rehabilitative procedures to prevent, correct, minimize, or alleviate a physical impairment. Physical therapy includes the interpretation of performances, tests, and measurements, the establishment and modification of physical therapy programs, treatment planning, consultative services, instructions to the patients, and the administration and supervision attendant to physical therapy facilities. (PHYSICAL THERAPY, §148A.1)

According to the Merriam-Webster Dictionary, "mechanical" means "of or relating to machinery" and "device" is "an object, machine, or piece of equipment that has been made for some special purpose." According to the Free Dictionary "mechanical device" means "mechanism consisting of a device that works on mechanical principles." Based on these explanations and definitions, it does not seem to be giving physical therapists the right to insert needles into the human body.

While physical therapists may know the anatomy of the body very well, they may not be aware of all that is happening when you insert a foreign object into the skin. They are very knowledgeable and great at their job, but the use of needles is not a part of their area of expertise. My question is: why do they want dry needling to be allowed? I think it is safe to say this issue has come up because the use of needles is effective. Which is wonderful news! However, just because the modality works and physical therapists want to use it, doesn't mean they are qualified or licensed to do so.

Throughout my course of training to become an acupuncturist, I have undergone 3,000 hours of master level training and 720 hours in clinical internships with supervision. A professional acupuncture curriculum must consist of at least 705 hours in Oriental medical theory, diagnosis and treatment techniques in acupuncture and related studies, 660 hours in clinical training, 450 hours in biomedical clinical sciences, and 90 hours in counseling, communication, ethics, and practice management.

Public Response Request:

Dry Needling

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Emily Huem

Monday, October 5, 2015

Hello Judy & Iowa PTOT Board,

OCT 12 2015

My name is Deb van Latenstein and I am a licensed acupuncturist in the state of Iowa. I have been practicing in Iowa since 2007. I attended and received my diploma in Acupuncture and Oriental Medicine from Northwestern Health Sciences University in Bloomington, Minnesota. I took national boards to certify my knowledge in the areas of Acupuncture, Herbology and Oriental Medicine. I'd like to address my concerns related to the issues of dry needling and the use of acupuncture by those not licensed to practice acupuncture.

In the 1980's I remember hearing about an acupuncturist practicing in Iowa. At the time there was no licensure program. His practice of acupuncture was brought to the attention of the Iowa legislature – and with the intent to protect the public from the dangers of practicing without a license or the oversight of a governing (medical) board, he was told to cease practicing in Iowa. He was quickly put out of business and he left the state to practice elsewhere. Those who wanted to receive acupuncture had to do so out of state at that time.

In the 1990's, a need was growing and the public demanded that they have access to acupuncture, a proven modality to treat many health issues. A licensure program was developed and passed through the legislature. The Iowa Medical Board was designated as the governing board and set high and rigorous standards to all acupuncturists that wanted to practice in Iowa. All licensed acupuncturists in Iowa must graduate from an accredited acupuncture school, with a minimum of 2500 hours of classroom and clinical hours. They must pass their national boards. They also must complete ongoing education and reapply for licensure every two years. These requirements help to ensure that those practicing acupuncture in Iowa are *qualified* to practice acupuncture with the highest safety standards known to protect the public.

Recently it has been brought to my attention and the attention of the Iowa Association of OM & Acupuncture (IAOMA) that there is a *subset group* of physical therapists that are utilizing acupuncture needles in their practice. This is disturbing to me and to those in the acupuncture profession for a number of reasons.

The profession of acupuncture is being watered down and carelessly imitated and passed off as a new and unique therapy. It is being incorporated into another profession's scope of practice – without safety standards. Those practicing in the PTOT profession are ignoring the current laws that have been put into place to protect the public, as our profession is upheld to do.

When this sub group of physical therapists uses acupuncture it aims to undermine and devalue the profession of acupuncture. It also aims to confuse and defraud the general public – including unsuspecting patients that are being treated with acupuncture needles, insurance companies that pay for these services, as well as the legislative and judicial bodies that govern the safe practices of acupuncture in Iowa.

Illegal: While these physical therapists have been advertising the use of dry needling, they have been utilizing acupuncture needles and puncturing the skin with them. By definition, this is acupuncture and they are not licensed to do so. There is no supervision, no approved accredited training, no licensure standards, no continued oversight or ongoing education that physical therapists are required to follow. According to Iowa law, this is illegal.

Deception & Confusion: When physical therapists use the term 'dry needling', they do so by claiming that it is not the same as acupuncture. Yet in PT literature, dry needling is advertised as the insertion of a filament needle (aka acupuncture needle) directly into a myofascial trigger point to release tension and decrease pain. Acupuncture is defined as the insertion of a filament needle into the body. It has also been stated that dry needling dates back to the early 7th century when Sun-SSu Mo, who was a Taoist doctor that utilized 'ashi' points. These ashi points are acupuncture points that are also known as modern day trigger points.

The PTOT board did not consult with the Iowa Medical Board, which governs and oversees the practice of acupuncture. The PTOT board did not consider or consult with any practicing acupuncturists to clearly define their scope of practice. In board discussions, they concluded that since there wasn't any clear definition in the description of their profession or scope of practice - that the omission itself must then indicate that they have a right to practice acupuncture and incorporate it into their practice. This is exactly why in the 1980's the first acupuncturist in Iowa was told to leave, because he was practicing without a license.

Predatory, Undermining & Devaluing: While the acupuncturists are bound to the high standards of licensure in Iowa, the acts of the physical therapists utilizing dry needling techniques are causing harm to the field of acupuncture. While potential patients may be looking for acupuncture as a treatment for their ailments, they may not choose to do so with an acupuncturist because many insurance policies do not cover acupuncture treatments. But, if they go to a physical therapist that can treat them with acupuncture needles (and can code in such a way to get those treatments paid for through their insurance), then they can see the economic benefit to choose a PT over an acupuncturist. This is a predatory practice and it serves to undermine and devalue the education, skills and practice of acupuncture.

The above stated reasoning is justification for PT's to cease and desist utilizing acupuncture needles in their field. For similar reasons, those within each field of practice must fulfill requirements and adhere to the laws that govern them. I believe the proper route to obtain a license for any of these professions is clearly defined in the Iowa laws set forth by the legislature. Those wanting to practice according to those laws should meet all the requirements listed and apply for a license to do so in the state of Iowa. Therefore,

I am not a licensed MD and do not perform surgeries or prescribe pharmaceuticals.

I am not a licensed pharmacist and do not fill prescriptions.

I am not a licensed RN and do not give immunizations.

I am not a licensed chiropractor and do not perform adjustments for proper alignment.

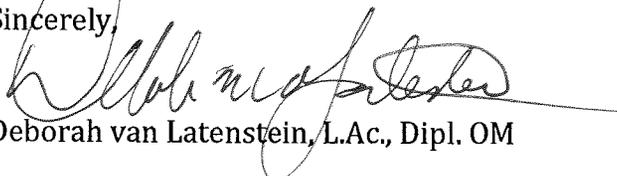
I am not a licensed dentist and do not perform x-rays, extractions or fill cavities.

I am not a licensed physical therapist and do not perform manual physical therapy

What I am is a licensed acupuncturist and I have completed all the requirements that have been set forth by the Iowa legislature to practice acupuncture in the state of Iowa. Furthermore, when I recognize the need for attention beyond my scope of practice-I have, and often do, refer out to those more qualified in their respective areas of expertise.

Thank you for your full consideration in this matter.

Sincerely,


Deborah van Latenstein, L.Ac., Dipl. OM

Public Response Request:

Dry Needling

OCT 12 2015

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Don Krug

Public Response Request:

Dry Needling

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Your Name: Bob Wellenborg

Public Response Request:

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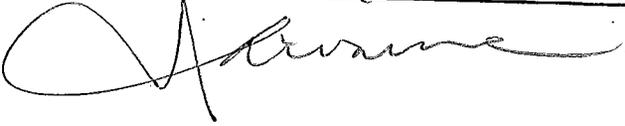
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Your Name: MARIANNE CHOQUET


Public Response Request:

Dry Needling

OCT 12 2015

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Your Name: Deana Kande

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Your Name: Rita M. Mantenaach

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Your Name: Alan J. Howell

Public Response Request:

OCT 12 2015

Dry Needling

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Your Name: Mary Beth Althaus

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Elaeni Reibert

Public Response Request:

Dry Needling

OCT 12 2015

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Mary Meyer

I only want someone who actually knows what they are doing because they have the proper schooling. I feel the human body is a complicated organ and needs extensive knowledge on how to treat it and care for it. I wouldn't let a Dr. with minimum hours of training work on me or take care of me. Needles can be a scary thing for some patients.

Public Response Request:

Dry Needling

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Your Name: Suzette Hughes

Public Response Request:

Dry Needling

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- Doctors of Chiropractic, 100 hours of non-accredited, certified training.
- Physical Therapists, minimum 24 hours of training in Dry Needling.
- Athletic Trainers, minimum 24 hours of training in Dry Needling.
- Medical Doctors, with 0 to 300 hours of training.

Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Sandra Leonard

Public Response Request:

Dry Needling

OCT 12 2015

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Suzanne M. Lezz

I have had this procedure done by a Dr of Chiropractic and found it to only be temporary relief, if any. A waste of money for Patients, where if did find complete relief from a L4/A, not a waste of money.

Public Response Request:

Dry Needling

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Your Name: _____

Clate Herin

Public Response Request:

Dry Needling

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Bridget Pinzger

Public Response Request:

Dry Needling

OCT 12 2015

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Bryndi Mary Hart

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Dry Needling

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Your Name: Heather Mikes

Public Response Request:

Dry Needling

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Your Name: _____

Tom Pinger

Public Response Request:

Dry Needling

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Your Name: _____

Monica Schmitt

Public Response Request:

Dry Needling

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Yes No

- | | | |
|-------------------------------------|-------------------------------------|---|
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| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Medical Doctors, with 0 to 300 hours of training. |

Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Doris Kintyle

When needling - you need to know about the points of insertion - because of healing Both physical & emotional

Public Response Request:

Dry Needling

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Your Name: _____

John Schumailer

Public Response Request:

Dry Needling

OCT 12 2015

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Your Name: Meghan Thies

Public Response Request:

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Patrick Mcelan

I am very happy with what my acupuncturist does for me. The hours of training have help me.

Public Response Request:

OCT 12 2015

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Wear Bittles

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Heather Jungblut

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Your Name: John A. Noel

Public Response Request:

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Your Name: Elizabeth Neal

Public Response Request:

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Joan M Weber

When it comes to my health, I want someone who is properly trained for my safety and not end up with an injury or infection. I feel an Acupuncturist, properly trained and accredited compares to a Medical Doctor with his or her training and accredited license.

Public Response Request:

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Yes No

- (You're already the expert)*
- Licensed Acupuncturists, 2500+ hours of training, Nationally Accredited Graduate Degrees. !!
 - Doctors of Chiropractic, 100 hours of non-accredited, certified training.
bc alot of the foundation science is the same, however I do believe
 - Physical Therapists, minimum 24 hours of training in Dry Needling. *in order to practice the # of hours required should be more & those that do additional training are those looking to master this art of healing too (I sometimes replace of or in conjunction with)*
 - Athletic Trainers, minimum 24 hours of training in Dry Needling.
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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Katie Effertz

Manning, Judy [IDPH]

From: GEORGE OLESON <geole@msn.com>
Sent: Monday, October 12, 2015 11:28 AM
To: Manning, Judy [IDPH]
Subject: Use of acupuncture needles

To: Iowa Board of Physical and Occupational Therapy

I am writing at the suggestion of my acupuncture therapist, Katherine Whitmore Chuapoco, to offer my thoughts regarding the use of acupuncture therapies -- or dry needling -- by medical professionals, chiropractors, and physical therapists who lack the rigorous training demanded of acupuncturists. I urge you to protect the public's interest in maintenance of the availability of acupuncture therapy provided by -- and only by -- such acupuncture professionals.

I have been receiving acupuncture treatments from Katherine for chronic pain for nearly two years during which I have achieved the ability to effectively manage that pain. To say that I both believe in and value acupuncture therapy is an understatement. For me, it has been a God-send, and I credit Katherine's diligence and expertise for my success.

Throughout the period of my treatment, I also have worked with a licensed physical therapist (Alyssa Subbert) to whom I was referred by Katherine. Alyssa has supplemented Katherine's treatment by addressing the mechanical reasons for the pain I experience. I thus appreciate the distinction between the two disciplines as should the licensing laws and regulations of the State of Iowa. I trust the treatments provided by both Katherine and Alyssa in part because I know that each is properly trained in her own discipline. As a patient, it is particularly disconcerting to me to contemplate the possibility that anyone without extensive professional training would endeavor to engage in dry needling.

As a lay person and recipient of ongoing acupuncture therapy, I firmly believe that the State of Iowa should implement and uphold the highest standards for the provision of acupuncture therapy. I was startled to learn that this is even an issue. It shouldn't be.

I would be happy to supplement my thoughts if it would facilitate the Board's consideration of this matter.

Yours very truly,

George T. Oleson
2113 NW 136th Street
Clive, IA 50325

Manning, Judy [IDPH]

From: kirsten@coreptiowa.com
Sent: Tuesday, October 13, 2015 1:11 PM
To: Manning, Judy [IDPH]
Subject: Public Comment: Dry Needling

Attn: Judy Manning
Public Comment on Dry Needling

As a PT in the state of Iowa I am writing to comment on the current discussion on dry needling in our state and profession. While I, personally, do not practice dry needling, I do support the choice physical therapists have in administering it. Physical Therapists practicing under the Iowa PT licensure board, to date, have had no complaints related to dry needling performed by PTs and no malpractice insurance companies have concerns or significant claims related to PTs performing dry needling. In addition, the FSBPT reports that the academic background and clinical decision making process needed in dry needling is included in 86% of our required formal education; the remaining gap in knowledge is achieved in our post-grad training. Knowing only these few pieces of information is enough to recognize that PTs are practicing dry needling in a safe and competent manner. Continuing to work with the licensure board to clarify post-graduate training is an appropriate step to be taken in the future. As it currently stands, PTs should be able to continue incorporating their evaluation and assessment process with their dry needling practice.

Kirsten Radke, PT, DPT

Core Physical Therapy
2001 Westown Parkway, Suite 107
West Des Moines, IA 50265
515.440.3439
515.440.3832 fax

www.CorePTiowa.com



Attention:

The information contained in this message and or attachment(s) is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from any system and destroy any copies

Public Response Request:

OCT 13 2015

Acupuncture/Dry Needling

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Feel free to use this sheet to record your opinion on this public safety matter, so that your views may be submitted to the Board. You may also send letters or emails directly to the Board.

Please check "Yes" or "No" for who you think should be allowed to use acupuncture needles:

Yes No

- Licensed Acupuncturists, 2500+ hours (including 700-900 hours of supervised clinical internship) of training, Nationally Accredited Graduate Degrees.
- Doctors of Chiropractic, 100 hours of non-accredited, certified training.
- Physical Therapists, minimum 24 hours of training in Dry Needling.
- Athletic Trainers, minimum 24 hours of training in Dry Needling.
- Medical Doctors, with 0 to 300 hours of training.

Please use the space below to further explain your opinion (more space on the back):

Your Name (required): Merry Rankin

more on back...

Your Name: Merry Rankin

I have depended upon acupuncture as a vital component of maintaining my health. Fifteen years ago, considerable medical symptoms had me going to a number of medical professionals. I was given a number of medications and finally was told sometimes "things happen when we get older." Not accepting this diagnosis, I kept searching for relief which led me to the Iowa Acupuncture Clinic. Fifteen years later, I have no symptoms and have never felt better. I do acupuncture once monthly along with my husband and 85 year old mother. As we have, both benefited to think of having this vital component for our health compromised by improper and incomplete instruction to other medical professionals is both concerning and frightening. Please consider carefully the distinction between acupuncture techniques and the importance of adequate education and safety and not allow dry needling as a supported technique for acupuncture.

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Please use the space below to further explain your opinion (more space on the back):

Your Name (required): Thomas Anderson

more on back...

Public Response Request:

Dry Needling

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- [?] Doctors of Chiropractic, 100 hours of non-accredited, certified training.
maybe
- Physical Therapists, minimum 24 hours of training in Dry Needling.
- Athletic Trainers, minimum 24 hours of training in Dry Needling.
- [?] Medical Doctors, with 0 to 300 hours of training.
maybe

Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: By Johnson I wouldn't ask a
physical therapist or athletic trainer to do acupuncture,
just as I wouldn't expect my acupuncturist to do
px therapy or ath. training. If you want to do →

the service, get the degree/licensure. WHY do
p.t.s want to do this? Do the training. It's
simple. Western med. + Eastern med. can and
should be compatible + used together. But - each
person needs to believe in the specialty + use it
with the right accreditation. Do the work
to achieve the goal.

Public Response Request:

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Mary Wakefield

I would not feel safe and comfortable if I wasn't
with a licensed acupuncturist. Letting whomever perform
the same work is disrespectful to the profession and negates

their expertise. They didn't do all that education and training for nothing. Acupuncturists aren't trying to act as physical therapists or chiropractors so why should they try to do acupuncture?

Would you let a surgeon operate on you who had only attended a few classes? Of course not, that would be too risky. There's a reason these professions go through so much training, so they can be the best qualified to do their jobs.

I know these other professional groups are much larger, but please don't let that sway you. The potential for accidents and injuries with non-acupuncturists is simply too high to be allowed in Iowa. Please let the experts stick to their field.

Public Response Request:
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Please use the space below to further explain your opinion (more space on the back):

Your Name (required): Jennifer Carwell

more on back...

Public Response Request:

Dry Needling

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Please use the space below to further explain you opinion (more space on the back):

Your Name (required): Debra A. Kimball MD

more on back...

October 6, 2015

Iowa Physical and Occupational Therapy Board

The practice known as "dry needling" performed by non-medical (such as physical therapists and athletic trainers), marginally trained (such as physician assistants and nurse practitioners) and other medical practitioners (such as medical and osteopathic physicians and chiropractors) should be simply and purely considered medical malpractice. The token "training" these proponents receive, as well as lack of quality control and adequate supervision during the use of Class II Medical devices in invasive procedures is appalling. Those who already practice their version of acupuncture, euphemistically called dry needling, are practicing at a level of medicine that clearly falls far below the expected standard of medical care, and may even border the status of a criminal act.

The level of training is so minimal, it is essentially non-existent. These persons have almost no knowledge of the Chinese culture nor the principles that are the very foundation of the true practice of acupuncture.

I firmly believe that this proposal is financially driven. A true medical practitioner who determines a patient may benefit from acupuncture is morally obligated to refer their patient to a fully trained, accredited and licensed acupuncturist. Anything less is unacceptable. I reiterate that those who chose to practice acupuncture themselves are negligent and are performing at a level of malpractice.

Another concern involves the financial realm of medicine. How much is the patient charged? Is insurance billed for these procedures (either overtly or hidden, bundled in a "mega bill")? If the latter is true, then the question of insurance fraud must be addressed.

Passage of this proposal is another symptom of the decline of the quality of medical practice in the USA.

Think carefully, and foremost consider the patient. Would you rather have yourself or a family member treated by an extensively trained, fully licensed acupuncturist or someone who attended a weekend "Cliff Note" version of this facet of medicine?


Debra A. Kimball, MD

Public Response Request:

Acupuncture/Dry Needling

OCT 13 2015

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Yes No

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Please use the back of this page to further explain your opinion.

Print Your Name (required): Pamela Kay Hawhee Signature: 

City/State/Zip code: Ames, IA 50010

Public Response Request:

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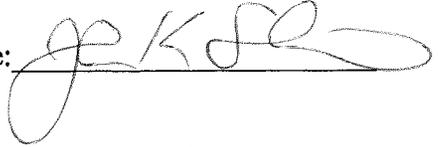
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Please use the back of this page to further explain your opinion.

Print Your Name (required): JOHN K SKERRITT

Signature: 

City/State/Zip code: AMES, IOWA 50010

515-232-6032

DRY NEEDLING APPEARS TO BE AN ADAPTATION OF
ACUPUNCTURE PRACTICES INTO OTHER MEDICAL DISCIPLINES.
USE OF ANY NEEDLES, WHETHER DRY HYPODERMIC OR
DEDICATED ACUPUNCTURE, IN THIS, ^{PARTICULAR} WAY, IS ACUPUNCTURE
& IT SHOULD BE PERFORMED BY PRACTITIONERS WITH
THE TRAINING & CREDENTIALS OF AN ACUPUNCTURIST
PERIOD. I CANNOT SEE HOW 24-300 HOURS OF
TRAINING ON TOP OF ~~THE~~ ^{ANY} PRACTITIONER'S OWN FIELD
OF STUDY, EXPERTISE & PRACTICE CAN PROVIDE ANY
KIND OF SENSE OF COMFORT & SAFETY IN THIS
PRACTICE OF "DRY NEEDLING" ~~AS~~ AN ADJUNCT
SERVICE.

PHYSICAL THERAPISTS & OTHERS SHOULD REFER SUITABLE
PATIENTS TO THE EXPERTS IN THE FIELD OF DRY
NEEDLING. ACUPUNCTURISTS WHO ARE CREDENTIALLED TO
PRACTICE IN THE STATE OF IOWA.

THIS DEEP, INVASIVE, TECHNIQUE SEEMS TOTALLY FOREIGN
TO MY UNDERSTANDING OF THE PT SCOPE OF PRACTICE.
MOST OF WHICH IS PERFORMED ON THE EXTERIOR WITHOUT BREAKING
THE SKIN. IT SHOULD STAY THAT WAY.



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- Medical Doctors, with 0 to 300 hours of training.

Please use the space below to further explain you opinion (more space on the back):

Your Name (required): Sue Twilley

I have had acupuncture treatments for 6 years,
and they have been helpful. I rely on the expertise
of the licensed acupuncturist. I can not imagine

more on back...

Your Name: Sue Twilley

That the other groups doing Dry needling with such limited Training could safely and effectively treat patients.

Either these groups should NOT be allowed to practice Dry needling therapy or they should be required to have a significantly higher level / hours of training.

Thank you. I imagine the lobbying efforts of these other groups is more intense than the Licensed Acupuncturists, so I hope the Board will use ^{information} judiciously to reach a decision.

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Your Name: 

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Ann Fichtinger

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Your Name: Ann Klossing

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Patricia Conzett

Center for Acupuncture and Healing Arts

520 39th Street • Des Moines, IA 50312

Licensed Acupuncturists • Masters of Science in Oriental Medicine • Jin Shin Jyutsu

OCT 14 2015

October 2, 2015

Iowa Board of Physical & Occupational Therapy
312 E. 12th St.
Des Moines, Iowa 50319

To the Iowa Board of Physical & Occupational Therapy,

My name is Katherine Whitmore Chuapoco, I am a licensed acupuncturist and a diplomate of acupuncture by the NCCAOM. I am also a registered nurse in the state of Iowa, and have maintained an active R.N. license since 1996. I have been an acupuncturist in private practice for 15 years, and I was the first acupuncturist at the Des Moines VA Hospital from 2001 to Feb. 2015, specializing in pain management.

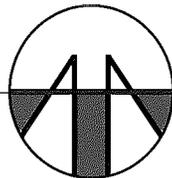
At the Des Moines VA Hospital, I was part of the Pain Management Team, working with doctors, physician's assistants, nurses, physical therapists, and most recently, chiropractors. This diversified approach gives patients the best care possible to meet their needs, decided on a case by case basis. Each person had a role in the patient's care based on their title, educational background/ training, and professional scope of practice. The beauty of the team approach really comes down to referring the patient to the provider that best fits the patient's needs. Referrals to other providers were done if the case warranted additional services or needed a new direction of care. Recognizing the difference in expertise of skills and service, and referring to the appropriate provider, sets the tone for the highest quality of care for a patient. This helps to ensure the best possible outcome. This brings me to the point I would like to make about PT's performing dry needling. They are, in a sense, standing between the patient and a more qualified provider, a licensed acupuncturist. This could mean the difference between success or failure of treatment. Physical therapists are performing an invasive technique they call Dry needling, which in fact is acupuncture. They are using an acupuncture needle while being undertrained and without proper safeguards. This becomes less about the patient, and more about what the profession has to gain by including a technique outside the defined scope of practice.

I have the utmost respect for physical therapists and I refer to them all the time for what they are able to do for the betterment of my patients. I believe they are the *experts* when it comes to manual therapy that is, a "hands on" approach with working on the muscles. I, in turn, would hope they would refer to me, an *expert* in the insertion of filiform needles, also known as, acupuncture needles based on my extensive educational background in oriental medicine and clinical experience.

Allowing physical therapists to perform dry needling, an invasive technique with minimal training, clearly poses a risk to the public's safety and undermines the notion of receiving the highest standard of care by a medical professional.

The term "mechanical device" means a mechanism consisting of a device that works on mechanical principles and is not the same thing as a "medical device," which by definition is an instrument, apparatus, implant, in vitro reagent, or similar or related article that is used to diagnose, prevent, or treat disease or other conditions, and does not achieve its purpose through chemical action within or on the body. The FDA has classified the acupuncture needle,

Katherine Whitmore



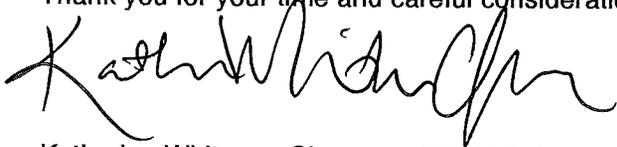
Brendan D. Chuapoco

which is a filiform needle, as a Class II medical device. Dry needling which is the use of an acupuncture needle, referred only to as a filiform needle by Physical therapists, is the same needle that is considered a "medical device" used to puncture the skin. Saying otherwise is an example of skewing the lines of definition for the sole purpose of professional interest, rather than focusing on public safety.

In my opinion, this is not a "turf war," but is instead about respecting educational backgrounds and scopes of practice. Take, for example, the difference between a Physical Therapist and a Physical Therapist Assistant. The obvious difference is the amount of education one must complete before being licensed under the designated title. Under code 200.6(5)a. for Iowa Physical Therapists Professional Licensure codes, it is stated that the PTA "shall provide only those services for which the PTA has the skills necessary and shall consult the supervising therapist if the procedures are believed not to be in the best interest of the patient." This statement showcases the levels of responsibility and skills that are based on one's education, and also intended to protect public safety by prioritizing the best interest of the patient. I believe this same idea should be true when it comes to making sure a patient is referred to the appropriate provider for a specialty service by an individual with the educational background and extensive training to show for it. This is acting in the patient's best interest. Acupuncturists have hundreds of hours of clinical training and 2000+ hours of didactic classes before actually executing our skills in using a filiform needle/ acupuncture needle on a patient. Would it really be in the public's best interest to be treated by a Physical Therapist, or anyone else for that matter, with as little as 24 hours of training to use an acupuncture needle to perform this invasive technique? I absolutely disagree with this as a Licensed Acupuncturist, as a health care provider, and more importantly, as a person of the public in the state of Iowa.

Please vote against Dry needling by Physical Therapists, which is a vote *for* protecting the public's safety, *for* respecting higher educational standards, and *for* the best interest of all patients.

Thank you for your time and careful consideration.

A handwritten signature in black ink, appearing to read 'Katherine Whitmore Chuapoco'. The signature is fluid and cursive, with the first name 'Katherine' being the most prominent.

Katherine Whitmore Chuapoco RN, M.S.O.M, L.Ac

Manning, Judy [IDPH]

From: kgasner@iw.net
Sent: Wednesday, October 14, 2015 10:56 AM
To: Manning, Judy [IDPH]
Subject: Dry Needling

Katherine Tiedeman, PT, DPT, CSCS

Buena Vista Regional Medical Center

1525 W. 5th Street

Storm Lake, IA 50588

Bureau of Professional Licensure

Attn: Judy Manning

Lucas State Office Building, 5th floor

321 East 12th St.

Des Moines, IA 50319-0075

Dear Ms. Manning:

I am a physical therapist that has been using dry needling with my patients. I am writing to you today in regards to the recent petition of declaratory order submitted by the Iowa Association of Oriental Medicine and Acupuncture stating the dry needling is not within a physical therapist scope of practice. I urge the Iowa Licensure Board to include dry needling in a physical therapist's scope of practice.

In our doctorate level physical therapy training, we get extensive anatomy instruction which includes dissection of cadavers. The caliber of the anatomy classes we take are the exactly the same as medical students. In fact, physical therapy students and medical students are in exactly the same anatomy classroom. Physical therapy schools also place a heavy emphasis on palpation skills. Physical therapists also receive instruction in wounds, wound care, clean and sterile procedures. Lastly, at dry needling courses, we are required to pass a skills test and a written exam.

Safety is always a high priority with any type of treatment we are performing. Dry needling is no exception. In fact it is stated in our profession's Code of Ethics Principle #3 states " Physical therapists shall be accountable for making sound professional judgments" <http://www.apta.org/Policies/Ethics/> .

In my physical therapy practice, dry needling has been a very valuable treatment technique. I do not use dry needling as a stand-alone treatment nor do I claim that I am performing acupuncture. I use dry needling in conjunction with other physical therapy techniques. Consequently, dry needling along with other physical therapy treatment techniques has helped to decrease pain and increase function in hundreds of my patients.

I urge the Iowa State Board of Professional Licensure to include dry needling within the scope of practice for physical therapist. Physical therapists have the knowledge to perform this treatment technique in a safe and effective manner.

Thank you for your attention on the very important manner.

Professionally,

Katherine Tiedeman, PT, DPT, CSCS

Public Response Request:

OCT 14 2015

Acupuncture/Dry Needling

On September 11, 2015, a handful of Iowa licensed acupuncturists attended the Iowa Board of Physical and Occupational Therapy's Meeting. On the agenda was time to discuss whether physical therapists should be allowed to perform an acupuncture technique they call Dry Needling. All of the acupuncturists in attendance spoke against PTs performing this invasive therapy, but physical therapists in attendance argued for the "Dry Needling" acupuncture technique to be allowed. Following this meeting, the Iowa POT Board will allow public input on this matter *only until October 29*. Then they will deliberate and make a final decision in December. The Board published the following statement:

"Anyone from the public wishing to submit written comments or other documents may do so by mailing or delivering them to the [Iowa Physical and Occupational Therapy] Board office "Attn: Judy Manning" or by emailing them to Judith.manning@idph.iowa.gov. All submissions must be received by October 29, 2015."

Mail to: IPOT/Judy Manning, Lucas Building, 321 E. 12th St., Des Moines, IA 50319.

Feel free to use this sheet to record your opinion on this public safety matter, so that your views may be submitted to the Board. You may also send letters or emails directly to the Board.

Please check any and all boxes for who you think should be allowed to use acupuncture needles:

Yes No

Licensed Acupuncturists, 3,300+ hours of training (including 700-900 hours of supervised clinical internship), Nationally Accredited Graduate Degrees.

Doctors of Chiropractic, 100 hours of non-accredited, certified training.

Physical Therapists, minimum 24 hours of training in Dry Needling.

Athletic Trainers, minimum 24 hours of training in Dry Needling.

Medical Doctors, with 0 to 300 hours of training. *maybe if they have same training as acupuncturists*

Please use the back of this page to further explain your opinion.

Print Your Name (required): KAYE CARSON Signature: Kaye Carson

City/State/Zip code: Shulley, IA 50134

Public Response Request:

Dry Needling

OCT 14 2015

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Please check any and all boxes for who you think should be able to use acupuncture needles:

Yes No

- Licensed Acupuncturists, 2500+ hours of education(including 700-900 hours of supervised clinical internship) resulting in Nationally Accredited Graduate Degrees.
- Doctors of Chiropractic, 100 hours of non-accredited, certified training.
- Physical Therapists, minimum 24 hours of training in Dry Needling.
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- Medical Doctors, with 0 to 300 hours of training.

Please use the space below to further explain you opinion (more space on the back):

Your Name (required): William J. Breen Will J B

more on back...

Public Response Request:

Acupuncture/Dry Needling

OCT 14 2015

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Please check "Yes" or "No" for who you think should be allowed to use acupuncture needles:

Yes No

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- Doctors of Chiropractic, 100 hours of non-accredited, certified training.
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- Athletic Trainers, minimum 24 hours of training in Dry Needling.
- Medical Doctors, with 0 to 300 hours of training.

Please use the space below to further explain your opinion (more space on the back):

Your Name (required): Morgan Rivers

more on back...

Public Response Request:

Dry Needling

OCT 15 2015

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- Medical Doctors, with 0 to 300 hours of training.

Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Lacey Giunta

Public Response Request:

Dry Needling

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- Medical Doctors, with 0 to 300 hours of training.

Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Nick Giunta

Public Response Request:

Dry Needling

OCT 16 2015

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Jian Gao

Acupuncture requires more time to learn
and examine. A wrong acupuncture might
cause bad influence, thus an acupuncturist must
be skillful, enough.

Public Response Request:

Dry Needling

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- Medical Doctors, with 0 to 300 hours of training.

Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Gwendolyn Stanley

In my opinion, only a licensed acupuncturist,
with 2500+ hours of training, is qualified to use
acu. needles. Thorough training + practice. is needed
to master, and responsibly practice, this intricate +
ancient medical art.

Public Response Request:

Dry Needling

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Melissa Ross

Public Response Request:

Dry Needling

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Rob Weingerist

The same requirements for licensing of acupuncturists
should exist for anyone wishing to practice
acupuncture or use acupuncture needles.
Remain in your professional scope of practice!

Date: 10/8/15

OCT 16 2015

ATTN: JUDY MANNING
IOWA BOARD OF PHYSICAL AND OCCUPATIONAL THERAPY
321 E. 12TH STREET
DES MOINES IOWA 50319

RE: The practice of "dry needling" by physical therapists and other practitioners not sufficiently trained to practice acupuncture. It is my belief that "dry needling" is actually acupuncture using acupuncture needles and acupuncture points (ashi points)

Dear Ms. Manning and Board Members,

As a licensed massage therapist and avid acupuncture client/patient, I am concerned about the health & safety of the public when I hear of physical therapists, trainers, etc using dry needling techniques with clients. Dry needling is acupuncture and should therefore only be performed by trained & licensed acupuncturists. I enjoy many modalities of healing with many practitioners and would not feel at all safe or comfortable having "dry needling" performed by a pt, tattoo artist, massage therapist, sports trainer, or chiropractor.

Sincerely,

Kristi Norman, LMT

5635803419

Date:

OCT 16 2015

ATTN: JUDY MANNING
IOWA BOARD OF PHYSICAL AND OCCUPATIONAL THERAPY
321 E. 12TH STREET
DES MOINES IOWA 50319

RE: The practice of "dry needling" by physical therapists and other practitioners not sufficiently trained to practice acupuncture. It is my belief that "dry needling" is actually acupuncture using acupuncture needles and acupuncture points (ashi points)

Dear Ms. Manning and Board Members,

I am an RN that has been going to a licensed acupuncturist for 2½ years. I believe any specialty that wants to use acupuncture for treatment should be required to be licensed, not just go to a few hours class. The public on a whole, as no idea there is a difference between a licensed acupuncturist & someone just doing it like a P.T. or chiro. Please do not allow P.T. or other disciplines or practitioners to do this skilled therapy without proper training.

Sincerely,

Coni M. Stephenson R.N.

Date:

OCT 16 2015

ATTN: JUDY MANNING
IOWA BOARD OF PHYSICAL AND OCCUPATIONAL THERAPY
321 E. 12TH STREET
DES MOINES IOWA 50319

RE: The practice of "dry needling" by physical therapists and other practitioners not sufficiently trained to practice acupuncture. It is my belief that "dry needling" is actually acupuncture using acupuncture needles and acupuncture points (ashi points)

Dear Ms. Manning and Board Members,

Please ensure the safety of all patients
Seeking acupuncture by eliminating
the use of "dry needling."

Sincerely,

Pamela S. Engelke

Public Response Request:

Dry Needling

OCT 16 2015

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- Medical Doctors, with 0 to 300 hours of training.

Please use the space below to further explain you opinion (more space on the back):

Your Name (required): Jennifer Horner

Other than a licensed acupuncturists, those on the
list above are not properly trained to perform
acupuncture. They have inadequate education
more on back...

Public Response Request:

OCT 16 2015

Dry Needling

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Cheryl Killmer

I wouldn't go to a surgeon with minimal hrs of training so I feel the same about having acupuncture done by someone with many hrs of training. The more

training they love the more they know about
the inception of the needles.

Public Response Request:

Dry Needling

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Tiffany Manning

Public Response Request:

Dry Needling

On 11 September 2015, a handful of Iowa licensed acupuncturists attended the Iowa Board of Physical and Occupational Therapy's Meeting. On the agenda was time to discuss whether physical therapists should be able to perform a technique called Dry Needling. All of the acupuncturists in attendance spoke against PTs performing this invasive therapy, but physical therapists in attendance argued for the technique to be allowed. Following this meeting, the Iowa POT Board will allow public input on this matter *only until October 29*. Then they will deliberate and make a final decision in December. The Board published the following statement:

"Anyone from the public wishing to submit written comments or other documents may do so by mailing or delivering them to the [Iowa Physical and Occupational Therapy] Board office "Attn: Judy Manning" or by emailing them to Judith.manning@idph.iowa.gov.

All submissions must be received by October 29, 2015." The Board is located in the Lucas Building, at 321 E 12th St, Des Moines, IA.

Feel free to use this sheet to record your opinion on this public safety matter, so that your opinion may be submitted to the Board. You may also send letters or emails directly to the Board.

Please check any and all boxes for who you think should be able to use acupuncture needles:

Yes No

- Licensed Acupuncturists, 2500+ hours of training, Nationally Accredited Graduate Degrees.
- Doctors of Chiropractic, 100 hours of non-accredited, certified training.
- Physical Therapists, minimum 24 hours of training in Dry Needling.
- Athletic Trainers, minimum 24 hours of training in Dry Needling.
- Medical Doctors, with 0 to 300 hours of training.

Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Elizabeth DeFell
Gabe Daffin

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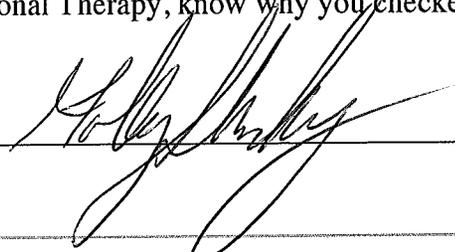
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Your Name: Molly Sherkley 

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Your Name: Janet Shepherd, Ph.D.
Licensed Psychologist
Iowa City, IA

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Your Name: Bruna Thompson

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Craig Steiner



Date: October 8, 2015 -

OCT 16 2015

ATTN: JUDY MANNING
IOWA BOARD OF PHYSICAL AND OCCUPATIONAL THERAPY
321 E. 12TH STREET
DES MOINES IOWA 50319

RE: The practice of "dry needling" by physical therapists and other practitioners not sufficiently trained to practice acupuncture. It is my belief that "dry needling" is actually acupuncture using acupuncture needles and acupuncture points (ashi points)

Dear Ms. Manning and Board Members,

I have witnessed the damage someone (physical therapist) can do with dry needling techniques. Surgery is now required to correct the ^{affected} individuals pain. PLEASE do what is needed to insure that acupuncture be performed by trained certified acupuncturists.

Would you want someone with only a few hours of training working on your energy points - better example would you want

Sincerely,

Ki Han

a physical therapist doing surgery on you? It is a similar problem.

Please do not allow
This to continue!